

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 04-11456-RWZ

GENERAL ELECTRIC MORTGAGE
INSURANCE CORPORATION,
Plaintiff,
Judgment Creditor

V.

CHI CHEN A/K/A CHEN HU,
A/K/A TRACY CHEN,
Defendant,
Judgment Debtor

RESPONSE TO ORDER TO SHOW CAUSE

NOW COMES Ching Yee M. Tsui ("Tsui"), a party in interest in the above-captioned matter, and responds to the order to show cause issued by the Court on March 29, 2005.

In support hereof, Tsui states as follows:

1. On March 29, 2005, this Court issued an order to show cause from the bench relating to a hearing scheduled on the Plaintiff's motion for injunctive relief.
2. The order to show cause appears to require Tsui to appear for a deposition in response to the Court's order that she answer questions relative to her acquisition of property located in Chelmsford, Massachusetts.
3. On April 12, 2005, counsel finally was able to reach Tsui and pending confirmation of agreeable dates between the parties will make herself available for deposition either within the Commonwealth of Massachusetts or the State of New Jersey.¹

¹ Ms. Tsui is presently residing on a temporary basis in the State of New Jersey for purposes of participating in training for her new employment. Depending upon timing of the deposition to be

4. At the present time, correspondence is being forwarded to Plaintiff's counsel in order to seek an agreed upon date for depositions to be conducted and for further information relative to such depositions. Specifically, to date, counsel has never been provided with a copy of the subpoena issued upon Tsui, or any list of documents related thereto.²

5. Based upon the foregoing, Tsui is not in violation of the Court's order, will schedule her deposition to be conducted at the earliest possible date, and requests this Honorable Court to release the order to show cause issued.

WHEREFORE, Tsui respectfully requests this Honorable Court to release the order to show cause, and to grant her such other and further relief as the Court deems just and proper.

Respectfully submitted,
Ching Yee M. Tsui
By her attorney,

Dated: April 13, 2005

/s/ Michael B. Feinman

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conducted, Tsui will make herself available for deposition in either location, depending on the availability of all parties.

² At the time of the hearing on March 29, 2005, counsel for Tsui requested a copy of the subpoena with the return of service thereon. To date, a copy of that subpoena, attachments, and the return of service have not been provided.